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Attorney for Defendant The Penn Mutual Life Insurance Company

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BREANNE ASHLEY FREEMAN, *et al.*,
Plaintiffs,
vs.
PENN MUTUAL LIFE INSURANCE
COMPANY, *et al.*,
Defendants.

Case No. 2:24-cv-10840-SPG-MAA

**STIPULATION TO EXTEND
TIME TO RESPOND TO
INITIAL COMPLAINT BY
NOT MORE THAN 30 DAYS
(L.R. 8-3)**

Complaint served: March 17, 2025
Current response date: April 7, 2025
New response date: May 7, 2025

Plaintiffs Breanne Ashley Freeman, Joel B. Freeman, Kevin M. Christian,
Linda D. Christian, Chase A. Gibson, Felicia D. Gibson, Nathan D. DeTracy,
Jennifer DeTracy, John Patrick Dwyer, Jr., Christine Dwyer, John David Jeffrey
Folsom, Micah Dannan Folsom, Thomas Bradley Foster, Ericka R. Foster, James
Hicks, Lara Hicks, Stephen Roger Innis, Jaime Rose Innis, Joshua Nathanael
Johnson, Season Marie Johnson, Karl McAllister, Melissa McAllister, Nathan
Wesley Moore, Dana Joanne Moore, Eric Pardue, Kristen M. Pardue, Lisa M. Price,

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**STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT
BY NOT MORE THAN 30 DAYS (L.R. 8-3)**

Case No. 2:24-cv-10840-SPG-MAA

1 Joshua L. Spencer, Melinda M. Spencer (“Plaintiffs”) and defendant The Penn
2 Mutual Life Insurance Company (“Penn Mutual”), by and through their respective
3 counsel, hereby agree and stipulate as follows:
4

5 WHEREAS, Plaintiffs filed the First Amended Complaint For Damages (the
6 “Complaint”), which was the first and only complaint served upon Penn Mutual in
7 this matter, on March 6, 2025 (Dkt. 10);
8

9 WHEREAS, Penn Mutual was served with the Complaint on or about March
10 17, 2025, such that the initial deadline for Penn Mutual to answer or otherwise
11 respond to the Complaint is April 7, 2025;
12

13 WHEREAS, pursuant to Local Rule 8-3, the parties may stipulate to extend
14 the time for any party to respond to an initial complaint for a period up to 30 days
15 without Court order;
16

17 WHEREAS, Penn Mutual requested, and Plaintiffs have agreed to, an
18 extension of an additional 30 days to respond to the Complaint;
19

20 WHEREAS, no prior extension requests have been made by, or granted to,
21 Penn Mutual;
22

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by
24 and between Plaintiffs and Penn Mutual, pursuant to Local Rule 8-3, through their
25 counsel of record, as follows:
26

1 1. Penn Mutual's deadline to respond to the Complaint is hereby extended to
2 and including May 7, 2025, without prejudice to any party's request for
3 further extensions.
4

5 IT IS SO STIPULATED.
6

7 Dated: April 2, 2025

By: /s/ Jessica Lewis

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12 *Attorney for The Penn Mutual Life Insurance*
13 *Company*

14 By: /s/ Andrew B. Holmes

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ATTESTATION OF CONCURRENCE IN FILING

Pursuant to United States District Court for the Central District of California's Civil Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all signatories to this document have concurred in this filing and have authorized this filing.

Dated: April 2, 2025

/s/ Jessica Lewis

Jessica Lewis